



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
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**SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7014 3490 0000 0065 8630  
RETURN RECEIPT REQUESTED**

September 23, 2015

Christina Beynon  
President  
Arco Recycling, Inc.  
1705 Noble Road  
East Cleveland, OH 44112

**FACILITY ID: 13-18-18-8703**

**RESOLUTION OF VIOLATIONS  
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Ms. Beynon:

On May 22, 2015, the Cleveland Division of Air Quality (CDAQ) inspected Arco Recycling, Inc. (Arco Recycling) located at 1705 Noble Road in East Cleveland.

On June 22, 2015, CDAQ issued a Notice of Violation requesting that Arco Recycling submit the following:

- A Permit-to-Operate/Install (PTIO) application for unpaved roadways;
- Two (2) weeks of monitoring and recordkeeping for Emission Unit (EU) F001: Construction and demolition debris storage piles and material handling;
- Records of vehicle weights on-site per operating day to determine compliance with emissions limitations with EU F002: Paved roadways and parking areas;
- A corrected Permit Evaluation Report (PER) for the year 2014 that includes deviations of monitoring and recordkeeping requirements; and
- A Corrective Action Plan explaining how Arco Recycling will promptly remove earth and/or other material from paved streets deposited by trucking.

Also, CDAQ requested that Arco Recycling begin keeping records for EU F002 of days on which control measures were implemented per quarter, and the number of days where precipitation was sufficient to not require control measures per quarter, in accordance with PTIO P0117248 C.1.d.3.d.

On July 24, 2015, CDAQ received the two (2) weeks sample of records for EU F001, the estimated upper limit for average vehicle weights on-site, a revised PER for the year 2014, and the update page #7 of your Work Practice Plan for fugitive dust prevention and control.

On August 6, 2015, CDAQ issued a Receipt of Corrective Action Plan letter to Arco Recycling stating that the requested documents had been received and added that the PTIO application for the unpaved roadways was being reviewed.



The corrective action was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action.

Should you have any questions, please call Andrew Smith at (216) 664-4181. All correspondence with CDAQ must include the Ohio EPA facility identification number for Arco Recycling: 13-18-18-8703.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/as

cc: Shawn McGee, Hull Inc.  
Terry Finn, Roetzel, Andress Law  
George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
James Kavalec, Ohio EPA Central Office  
John Paulian, Ohio EPA Central Office  
Brian Dickens, U.S. EPA Region V (Electronically)  
Stephen R. Feldmann, Ohio EPA Legal (Electronically)  
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